

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

JOSEPH R. ERNST,

Plaintiff,

v.

CIVIL NO. 3:11-cv-625

**EXPERIAN INFORMATION SOLUTIONS, INC.,
TRANS UNION, LLC, WACHOVIA MORTGAGE,
a Division of WELLS FARGO BANK, N.A.,**

Defendants.

PLAINTIFF'S SUPPLEMENTAL F.R.C.P. 26(a)(1) DISCLOSURES

COMES NOW the Plaintiffs, JOSEPH R. ERNST, by counsel, and makes
the following supplemental disclosures:

I. Individuals likely to have discoverable information

- x. Robert W. Lesnevich
Forensic Document Examiner
418 Lafayette Avenue
Cantonsville, MD 21228

Expert Witness

II. Description of documents in possession of the Plaintiff.

Other than those documents obtained from any Defendant in discovery, the Plaintiff has the following supplemental documents in his possession and control:

Plaintiff's Bate Stamp Nos. 000700 – 002159 - *forwarded to Defendant's Counsel under separate cover.*

Trans Union Q-A Manual as disclosed in *Linda Mullins v. Equifax Information Services, LLC, et al*, Eastern District Court, Richmond Division, Civil No: 3:05-cv-888;

Trans Union Master Service Agreement for Outsourcing Services dated January 16, 2004 as disclosed in *Linda Mullins v. Equifax Information Services, LLC, et al*, Eastern District Court, Richmond Division, Civil No: 3:05-cv-888; (*Trans Union Jury Trial Exhibit 39*)

Trans Union's Intelenet Statement of Work as disclosed in *Linda Mullins v. Equifax Information Services, LLC, et al*, Eastern District Court, Richmond Division, Civil No: 3:05-cv-888;

Copy of the decision by the United States Court of Appeals, Ninth Circuit dated January 19, 1995 regarding *Renie Guimond v. Trans Union*, No. 93-15800.

Copy of the decision dated June 9, 1997 by the United States Court of Appeals, Third Circuit regarding *Jennifer Cushman v. Trans Union Corporation*, No. 96-1553.

Copy of Memorandum and Order of the United States District Court, E.D. Pennsylvania dated September 29, 1999 regarding *James J. O'Connor v. Trans Union Corporation*, No. Civ. A. 97-4633.

Copy of the decision of the United States District Court, E.D. California dated July 29, 2003 regarding *Raffi Soghomonian and Deborah Garabedian v. The United States of America, the Internal Revenue Service, Fidelity National Title Insurance Company, Trans Union, LLC and Does 1-50, inclusive*.

Copy of the decision of the United States District Court, E.D. Pennsylvania, dated September 16, 2003 regarding *George Joseph Crane v. Trans Union, LLC*, No. 02-7599.

Copy of the decision of the United States District Court, E.D. Pennsylvania dated November 25, 2003 regarding *Roberta L. Evantash v. G.E. Capital Mortgage Services, Inc., et al*, No. Civ. A. 02-CV-1188.

Copy of the decision of the United States District Court, E.E. Pennsylvania dated December 11, 2003 regarding *Grace Lawrence v. Trans Union, LLC*, No. 02-4440.

Copy of the decision of the United States District Court, W.D. Wisconsin dated July 28, 2004 regarding *James McKeown v. Sears Roebuck & Co, Trans Union, LLC, Factual Data, Inc., Equifax, Inc., d/b/a Equifax Information Services, LLC and CSC Credit Services, Inc.* No. 03-C-528-C.

Copy of the decision of the United States Court of Appeals, Fourth Circuit dated February 11, 2004 regarding *Linda Johnson v. MBNA Bank, NA*, No. 03-1235.

Transcript of the Final Pretrial Hearing before the Honorable Robert E. Payne, United States District Judge dated January 18, 2006 in *Linda Mullins v. Equifax Information Services, LLC, et al*, Eastern District Court, Richmond Division, Civil No: 3:05-cv-888.

Transcript of the Jury trial before the Honorable Robert E. Payne, United States District Judge held on February 22, 2007 in *Linda Mullins v. Equifax Information Services, LLC, et al*, Eastern District Court, Richmond Division, Civil No: 3:05-cv-888

Transcript of the Jury trial before the Honorable Robert E. Payne, United States District Judge held on February 23, 2007 in *Linda Mullins v. Equifax Information Services, LLC, et al*, Eastern District Court, Richmond Division, Civil No: 3:05-cv-888

Jury Instructions given by the Honorable Robert E. Payne, United States District Judge in *Linda Mullins v. Equifax Information Services, LLC, et al*, Eastern District Court, Richmond Division, Civil No: 3:05-cv-888.

August 27, 2007 post trial opinion by the Honorable Robert E. Payne, United States District Judge in *Linda Mullins v. Equifax Information Services, LLC, et al*, Eastern District Court, Richmond Division, Civil No: 3:05-cv-888.

Transcript of the deposition of Ramnish Awasthi dated September 1, 2006 in *Linda Mullins v. Equifax Information Services, LLC, et al*, Eastern District Court, Richmond Division, Civil No: 3:05-cv-888. (*Trial Exhibit*)

Copy of the decision of the United States Court of Appeals, Sixth Circuit in *Dorothy B. Bach v. First Union National Bank*, No. 04-3899 dated August 22, 2005.

Copy of the decision of the United States Court of Appeals, Sixth Circuit in *Dorothy B. Bach v. First Union National Bank*, No. 06-3660 dated May 15, 2007.

Copy of the decision of the United States Court of Appeals, Ninth Circuit, in *Jason Dennis v. BEH-I, LLC, et al.*, No: 04-56230.

Copy of the decision of the United States District Court, E.D Virginia, Alexandria Division in *Bruce Burke v. Experian Information Solutions, Inc.*, No: 1:10-cv-1064) dated March 18, 2011.

Copy of the Opinion of the U.S. Court of Appeals, Third Circuit in *Sandra Cortez v. Trans Union*, No. 08-2465 and 08-2466.

Copy of the Memorandum in the United States District Court for the District of Delaware dated November 23, 2010 in *Teresa Price v. Trans Union*, Civil Action No: 09-1332.

Transcript of the Evidentiary Hearing before the Honorable Walter Shapero, United States Bankruptcy Judge, U.S. Bankruptcy Court, Eastern District of Michigan, Southern Division, *In Re: Robert Juliao*, Case No: 07-48694-WS dated August 25, 2009 (*Wells Fargo Employee explaining data conformity as its ACDV procedure*)

Plaintiff reserves the right to further supplement these disclosures.

JOSEPH R. ERNST

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 20 day of December, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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